

Name: William Brewster ("WITNESS")

(b) (6)

Affiliation: Former Employee/Peck Iron and Metal Company

Telephone:

(b) (6)

Type of Interview: In-Person

Date of Interview: March 17, 2009

On March 17, 2009 the WITNESS was interviewed at his place of employment by (b) (4) (b) (4) Senior Investigator, of (b) (4) (b) (4). The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001, Site 24 the Peck Iron and Metal Site, Portsmouth, VA (the "Site.") The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked, and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this matter and did not want an attorney present. No other persons were present and this interview was not tape-recorded.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former employees.

The WITNESS was asked to explain any association he had with Peck Iron and Metal (PIM) Site located in Portsmouth, VA.

The WITNESS stated that he was employed by PIM from 1975 to January 1998. The WITNESS stated that Julius Peck had owned the PIM facility in Portsmouth since 1945. The WITNESS stated that in 1975 Julius Peck sold the PIM scrap yard to the following British scrap Company.

- Bird International.

The WITNESS stated that Bird International (Bird) operated the PIM scrap yard until 1979. The WITNESS stated that in 1979 Bird sold the PIM scrap yard back to Julius Peck.

When asked if he worked for Bird during the time period Bird operated the PIM scrap yard, the WITNESS stated no. The WITNESS further explained that from 1975 to 1979 the WITNESS worked for the Peck Equipment Company. The WITNESS stated that the Peck Equipment Company was located adjacent to the PIM scrap yard at the address of 3850 Elm Street. The WITNESS stated that the Peck Equipment Company occupied three large warehouses previously owned by Proctor and Gamble Company.

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When asked if the Peck Equipment Company rented the warehouses from Proctor and Gamble the WITNESS stated that Julius Peck may have rented the warehouses initially; however, the WITNESS stated that Julius Peck eventually purchased this property.

The WITNESS explained that Peck Equipment purchased surplus ship equipment such as turbines, engines and ship parts. The WITNESS stated that the U. S. Navy published monthly catalogs listing equipment needed. The WITNESS stated that Peck Equipment would sell the surplus equipment to the Navy.

The WITNESS explained that when Peck sold the PIM scrap yard to Bird, Peck was precluded by the contract with Bird from getting into the scrap business within a fifty mile radius of PIM. The WITNESS stated that Julius Peck started the Richmond scrap yard as a result.

The WITNESS explained that he was the controller/bookkeeper for PIM during the entire time he was employed by PIM. The WITNESS stated that he paid accounts billable and prepared bills for payment. The WITNESS stated that he was assisted by (b) (6)

The WITNESS was asked the names of the Companies who sold PIM scrap metal and disposed of the scrap at PIM the WITNESS provided the following.

- U.S. Government: The WITNESS stated that PIM's biggest customer was the Government, and more specifically the Navy. The WITNESS stated that PIM purchased scrap through auctions held at the St. Julian's Annex. The WITNESS stated that Scrap from military basis throughout the east coast was shipped to the St. Julian's Annex. The WITNESS stated that PIM also bid on bulk scrap through the Department of Defense Material Command. The WITNESS stated that the scrap consisted of iron, non-ferrous metals and steel.
- Oceana Naval Air Station: The WITNESS stated that PIM made "spot" purchases from Oceana. The scrap included pipes and steel.
- Newport News Shipbuilding and Dry Dock Company ("NNSC"): The WITNESS stated that NNSC was a large account and that PIM purchased heavy steel, plates from ships steel beams.
- AT&T Company: The WITNESS stated PIM purchased wire and cooper from AT&T.
- Verizon: The WITNESS stated that PIM purchased wire and cooper from Verizon.
- Norfolk-Portsmouth Beltline: The WITNESS stated that PIM purchased rail, spikes, bolts and switches from this Company.
- Proctor and Gamble: The WITNESS explained that prior to 1975 the P&G factory located adjacent to PIM was a soap factory. The WITNESS stated that in

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approximately 1975 the P&G plant was converted to a peanut producing factory. The WITNESS stated that P&G sold steel bins and old motors to PIM.

- Colonas Ship Yard: The WITNESS stated that PIM purchased aluminum, iron and light steel from Colonas.
- Virginia Power and Electric Company ("VEPCO"): The WITNESS stated that VEPCO was a steady customer at PIM, however he could not recall the types of waste.
- Anheuser Busch: The WITNESS stated that Anheuser Busch was a customer of PIM and the Peck facility in Richmond. The WITNESS could not recall the types of waste purchased from this Company.
- CSX Transportation, Inc.: The WITNESS stated that PIM purchased scrap from CSX on a regular basis however he was unable to recall the type of scrap.
- Gwaltney: The WITNESS stated that PIM purchased scrap from Gwaltney on a regular basis. The WITNESS described the waste as duck work, conveyer systems and condensers. When asked if the condensers contained Freon, the WITNESS stated that he does not know.
- Norfolk Shipbuilding & Dry Dock: The WITNESS stated that this Company was a regular customer at PIM. The WITNESS was unable to recall the types of scrap.
- Plasser American: The WITNESS stated that Plasser was a semi-regular customer at PIM. The WITNESS described the scrap as steel frames and beams.
- Sumitomo Machinery Corporation of America ("SMCA"): The WITNESS stated that SMCA was a regular customer at PIM. The WITNESS could not recall the types of Scrap.
- Woodington Electric: The WITNESS stated that Woodington was a regular customer and that PIM purchased wire from Woodington.

The WITNESS stated that PIM purchased scrap from many other companies however he was unable to recall any further names.

When asked if he was aware of the location of any records, the WITNESS stated yes and provided the following.

- The WITNESS stated that when he left employment with PIM in 1998, all of the records relating to PIM were located in the building at 3500 Elm Street. The WITNESS stated that these records included all books and ledgers covering the prior twenty years.

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When asked the name of the insurance company that carried PIM insurance, the WITNESS stated that PIM contracted with (b) (4) to handle all insurance matters.

The WITNESS was asked to explain the association of the following companies to the Peck family. The WITNESS provided the following.

- Peck Iron and Metal Company: The WITNESS stated that Peck Iron and Metal was used as a holding company as well as the name of the PIM location in Portsmouth.
- Peck-Portsmouth Recycling: The WITNESS stated that he was unfamiliar with this name.
- ELM Leasing Company: The WITNESS stated that ELM leasing company was the Peck Company that leased the warehouse next to 3500 Elm Street. The WITNESS stated that Peck leased this warehouse to numerous businesses for storage of equipment.
- JSP Land Company, Inc.: The WITNESS stated that JSP was organized so that Julius Peck could rent a portion of the property under JSP Land Company to PIM and receive the rent for his property.

When asked the names of other PIM employees, the WITNESS provided the following.

- (b) (6) Scale operator
- (b) (6) Yard supervisor.
- (b) (6) Assistant bookkeeper.

The WITNESS stated that PIM employed more than fifty laborers and truck drivers. The WITNESS indicated that these employees were usually from the local area.

The WITNESS stated that the area known as Carddock was a local neighborhood and (b) (6)

(b) (6)

The WITNESS was asked if he had any knowledge of the following companies waste or scrap being sold to PIM or disposed at the PIM facility in Portsmouth, VA. The WITNESS stated that he cannot recall the types of scrap that was purchased by PIM. The WITNESS provided the following information.

ABB National Industries, Hampton, VA: Could not recall.

Alcoa (Reynolds): Could not recall

American Gem Corporation, Chesapeake, VA: Could not recall.

Anheuser-Busch, Inc., Williamsburg, VA: See comments above.

Argent Marine, Solomons, MD: Could not recall.

Associated Naval Architects, Inc., Portsmouth, VA: Could not recall.

CSX Transportation Co., Charlotte, NC: See comments above.

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Electric Motor and Contracting Co., Chesapeake, VA: Could not recall
Ford Motor Company, Norfolk, VA: Could not recall.
General Electric Company, Richmond, VA: Could not recall.
General Foam Plastics Corp., Norfolk, VA: Could not recall
General Motors Corporation: Could not recall.
Gwaltney Company, Portsmouth, VA: See comments above.
Newport News Shipbuilding and Dry Dock Co., Newport News, VA: See comments above.
Norfolk Shipbuilding and Dry Dock, Co., Norfolk, VA: See comments above.
Overhead Door Company, Virginia Beach, VA: Could not recall.
Phillip Morris, Inc., Richmond, VA: Could not recall.
Plasser America, Chesapeake, VA: See comments above.
Potomac Electric Power Co., Washington, D.C.: Could not recall.
Power Mechanical, Inc., Hampton, VA: Could not recall.
Southeastern Public Service Authority ("SPSA"), Chesapeake, VA: Could not recall
Sumitomo Machinery Corp., Chesapeake, VA ("SMC"): See comments above.
U. S. Navy, Norfolk, VA: See comments above.
AMF Bowling: Richmond, VA: Could not recall.
Alcatel-Lucent, Murry Hill, NJ: Could not recall.
Brenco, Petersburg, VA: Could not recall.
Carolina Steel Corporation, Greensboro, NC: Could not recall.
Chesapeake, Corporation, Richmond, VA: Could not recall.
Dean Foods, Dallas Texas: Could not recall.
E.I. DuPont de Nemours and Company, Wilmington, DE: Could not recall.
Federal-Mogul Corporation, Southfield, MI: Could not recall.
GATX Corporation, Chicago, IL: Could not recall.
The Hon Company, Muscatines, IA: See comments above.
IGM USA Inc., Charlotte, NC: Could not recall.
Kraft Foods, Northfield, IL: Could not recall.
Norfolk Southern Corporation, Norfolk, VA: Could not recall.
Pizzagalli Construction Company, Garner, NC: Could not recall.
Schlumberger Industries, Houston, TX: Could not recall.
Seaboard Marine, Miami, FL: Could not recall.
Stanley Hardware, New Britain, CT: Could not recall.
Super Radiator Coils, Richmond, VA: Could not recall.
Waste Management (Chambers Waste Systems of Virginia): Could not recall.
Windor Supply & Mfg., Inc., Tulsa, OK: Could not recall.
AT&T Micro-Electronics: Could not recall
Ball Metal Container, Williamsburg VA: Could not recall
Capitol City Iron Works: Could not recall
Cleveland Wrecking: Could not recall
Continental Can, Hopewell, VA: Could not recall
Davis Boat Works: Could not recall
General Electric, Portsmouth, VA: Could not recall
Gray Metal: Could not recall
Hoechst Celanese, Portsmouth, VA: Could not recall.

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Keller Industries: Could not recall
L.A. Gentry: Could not recall
Moon Engineering: Could not recall
Nassau Metals: Could not recall
NAITO America: Could not recall
Proctor and Gamble Company: See comments above
St. Laurent Paperboard Co. (Smurfit-Stone Container): Could not recall
Tyson Foods: Could not recall
Virginia Electric and Power Company (VEPCO): See comments above.
Weidmuller (Mann Industries): Could not recall
Woodington Electric, Virginia Beach/Norfolk, VA: See comments above.

The WITNESS stated that he cannot recall the types of scrap associated with each of the above PIM customers.

When asked where the records were kept, the WITNESS stated that the reconciliation sheets were kept in a separate file from the weigh tickets. The WITNESS stated that while he was employed at PIM, his files were filed in a filing cabinet in his office.

When asked the names of other employees at PIM, the WITNESS provided the following.

- (b) (6)
-
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"I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____
(Date)

Signed _____
(Name)

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INTERVIEW SUMMARY
Task Order 0001 Site 24
Peck Iron and Metal Site

Raymond L. Gottlieb

Prepared for:

U.S. Environmental Protection Agency
Region 3
Enforcement Support Services
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103

Prepared by:

Chenega Integrated Systems, LLC
5911 Kingtowne Village Pkwy
Suite 300
Alexandria, VA 22315

Work Assignment Number:
Date Submitted:
Contract Number:
EPA Work Assignment Manager:
Telephone Number:
Chenega Project Manager:
Telephone Number:
Interviewer:

Task Order 0001 Site 24
December 29, 2008
EP-S3-04-01
Joan Martin-Banks
(215) 814-3156

(b) (4)

A large black rectangular redaction box covers the contact information for the interviewee, including their name and phone number.

Name: Raymond L. Gottlieb (WITNESS)

(b) (6)

Affiliation: Former Employee/Peck Iron and Metal Company

Telephone:

(b) (6)

Type of Interview: In-Person

Date of Interview: December 10, 2008

On December 10, 2008 the WITNESS was interviewed at his place of employment at (b) (6)

(b) (4)

Senior Investigator, or (b) (4)

The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001, Site 24, the Peck Iron and Metal Site, Portsmouth, VA (the "Site.") The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked, and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this matter and did not want an attorney present. No other persons were present and this interview was not tape-recorded.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former employees.

The WITNESS was asked to explain any association he had with the Peck Iron and Metal (PIM) Site located in Portsmouth, VA.

The WITNESS stated that he was employed by PIM from 1958 to 1983. The WITNESS stated that PIM was a scrap metal yard and that his primary responsibility was to accept bids and write responses to bids for the purchase and/or sale of scrap metal. The WITNESS stated that he was not a manager at PIM and did not supervise any PIM employees.

The WITNESS explained that Julius Peck was the owner/operator of PIM. The WITNESS stated that Julius's two sons, Barry and Aaron worked at PIM and were primarily responsible for evaluating the value of scrap metal PIM was either purchasing or selling. Barry and Aaron were also responsible for the separation and inventory of the scrap.

The WITNESS stated that Barry was assigned to the Peck Iron and Metal location in Richmond, VA in the early 1960s.

When asked if there was a Victor Peck working at PIM, the WITNESS provided the following.

The WITNESS stated that Victor was a nephew of Julius and worked at the Richmond location. The WITNESS stated that Victor died in a car accident in the late 1960s. The WITNESS stated that Victor was approximately 35 years old when he died.

The WITNESS stated that Julius's brother, William Peck, also worked at PIM. The WITNESS stated that William Peck operated the scale house.

When asked to describe how PIM was operated, the WITNESS provided the following.

The WITNESS stated that PIM was located at 3500 Elm Street, Portsmouth, VA. The WITNESS stated that a scale house and office was located at the entrance of PIM.

The WITNESS explained that PIM accepted scrap metal from private customers as well as large corporations. The WITNESS explained that any scrap that had not been bid on in bulk would enter the PIM yard by the scale house.

The WITNESS explained that a full truck was weighed when the truck entered, and then weighed again after the truck's load was dumped. The WITNESS stated that the truck driver was paid based on the weight of the scrap.

When asked if there was any records used at the scale house, the WITNESS stated yes and provided the following.

The WITNESS stated that the scale house utilized a three copy weight ticket. The WITNESS stated that the weight ticket contained the truck drivers' name, truck tag number, weight of truck and a description of the contents of the truck. This ticket would also contain the weight of the truck empty and the amount to be paid by PIM for the load. The WITNESS further explained that William Peck kept one copy of the completed weight ticket. The truck driver would then present one of the two remaining weight tickets to a clerk in the office and the driver would be paid by this clerk.

When asked the names of the clerks that worked in the scale house, the WITNESS provided the following.

- Christine T. Perry

The WITNESS was unable to recall any other names of clerks.

When asked if the truck driver was paid in cash, the WITNESS stated the customers were paid by cash and check. The WITNESS stated that the type of payment was at the request of the customer.

The WITNESS explained that William Peck would inspect the type of waste in each load that entered PIM and the amount of payment would depend on the weight of the load and the type of the scrap.

When asked where these records were stored, the WITNESS stated that he does not know.

When asked where the records were kept for purchases, bids, employee records and any contracts, the WITNESS stated that these records would be kept in the office.

When asked the names of the employees who worked in the office, the WITNESS provided the following.

(b) (6) The WITNESS stated that (b) (6) was the office manager and was responsible for all records.

(b) (6) (female): The WITNESS stated that (b) (6) was a clerk in the office.

The WITNESS stated that he cannot recall the names of other individuals who worked in the office. The WITNESS stated that the main office was a tin building located next to the concrete pad that was used to separate scrap. (The WITNESS sketched out the Site. A copy of this sketch is attached.)

The WITNESS stated that a portion of PIM was rented by PIM from the Navy. The WITNESS identified the location of this land on the attached sketch.

The WITNESS stated that Proctor and Gamble Company owned much of the land surrounding PIM. The WITNESS stated that in the late 1960s, PIM purchased this property from Proctor and Gamble.

The WITNESS stated that PIM also received scrap from a railroad system known as the Norfolk-Portsmouth Belt Railroad. The WITNESS stated that gondola cars were operated on this railroad and that PIM received bulk scrap from the Norfolk Navy Ship Yard in the gondola cars.

When asked to identify the types of waste that PIM accepted and to identify the companies associated with the waste, the WITNESS provided the following.

The WITNESS stated that he was primarily involved in bidding for bulk purchases from the Norfolk Navy Yard. The WITNESS stated that the bidding process and the awarding of bids were channeled through the Defense Logistics Command.

The WITNESS stated that from 1958 to approximately 1965, either the WITNESS or Julius, Aaron or Berry Peck would inspect the items on bid and would establish a price for the bid. The WITNESS stated that in approximately 1965, the Defense Logistics Command ("DLC") changed the process and no longer allowed bidders to inspect the items up for bid.

The WITNESS explained that the DLC would publish bid sheets itemizing the contents of each item in the bulk scrap. The WITNESS stated that PIM would then decide on a price for the items. The WITNESS described the bid sheet as indicating the percent of the items

making up the purchase. As an example, the WITNESS stated that the DLC bid sheet would indicate 10% cooper, 5% steel, etc.

The WITNESS stated that once awarded to PIM, they would discover that all of the items were not present or the bulk scrap was short certain items. The WITNESS indicated that when shortages occurred, PIM would appeal the purchase through channels and attempt to lower the price paid. The WITNESS stated that PIM also litigated the award occasionally.

The WITNESS stated that scrap coming from the Norfolk Navy Ship Yard was the single largest source of scrap. He indicated that PIM received thousands of tons of scrap and described the following as the primary waste.

- Steel: Steel from the sides and hull of dismantled ships. Some of this steel would contain lead based paint.
- Pipes: The WITNESS stated that most of the piping received from the Navy Yard were from dismantled ships and that the pipes were painted with lead based paint.
- Cooper: Cooper from dismantled ships.
- Aluminum: Aluminum from dismantled ships.
- Generators: The WITNESS stated that PIM sold the generators to Earl Industries.

The WITNESS stated that from 1958 to approximately the early 1970s, the Norfolk Navy Yard mixed in all types of waste that would be taken from a ship including asbestos from piping and transformers. The WITNESS stated that in approximately 1970 the Navy separated electrical components from the scrap that was put out for bid.

When asked if the WITNESS was aware of an item known as goat, the WITNESS stated no.

The WITNESS was asked if the Peck family operated any other locations. The WITNESS stated yes, and provided the following.

- Gas station on Victory Road, Portsmouth, VA: The WITNESS stated that Julius Peck rented an old gas station located on Victory road. The WITNESS stated that this gas station was used to store heavy equipment and to rent heavy equipment.
- Pinners Point: the WITNESS stated that the Peck's operated Commonwealth Metals from this location. The WITNESS was not familiar with the Commonwealth Metals operations.

When asked the names of other generators, whose waste was received by PIM, the WITNESS provided the following.

- DuPont Company: The WITNESS stated that there was a DuPont plant in Richmond VA and that scrap was accepted by the Peck operation in Richmond.
- Alcoa: the WITNESS stated that Alcoa waste was purchased by PIM. The WITNESS stated that Alcoa scrap was transported to the Richmond VA Site.

- GATX Corporation: The WITNESS stated that PIM received cut up railroad cars from GATX. The WITNESS stated that this was mostly scrap steel, however some transformers were included.
- Phillip Morris: The WITNESS stated that Peck received Phillip Morris scrap at the Richmond facility. The WITNESS stated that he does not know the contents of this waste.
- Potomac Electric Power ("PEPCO"): The WITNESS stated that PIM received steel, wire, cooper and some transformers from PEPCO. The WITNESS does not know if the electrical transformers had been drained.
- Southeastern Public Service Authority ("SPSA"): The WITNESS stated that PIM received waste from SPSA which was mostly household waste. The WITNESS stated that the waste was separated and metals were salvaged.
- Virginia Electric & Power Company ("VEPCO"): The WITNESS recalled obtaining bids with VEPCO for boilers, generators and transformer wires. The WITNESS does not recall if transformers were included.
- Continental Can: The WITNESS stated that all scrap from Continental Can was transported to the Richmond facility.
- Overhead Door Company: The WITNESS stated that PIM received motors from this Company.

The WITNESS reiterated that his primary duties were to work with the military and he was not as familiar with other companies that PIM had as customers.

The WITNESS was asked if he had any knowledge of the following companies waste or scrap being sold to PIM or disposed at the PIM facility in Portsmouth, VA.

ABB National Industries, Hampton, VA: Could not recall.

Alcoa (Reynolds): See comments above.

American Gem Corporation, Chesapeake, VA: Could not recall.

Anheuser-Busch, Inc., Williamsburg, VA: Could not recall.

Argent Marine, Solomons, MD: Could not recall.

Associated Naval Architects, Inc, Portsmouth, VA: Could not recall.

CSX Transportation CO, Charlotte, NC: Could not recall.

Electric Motor and Contracting Co., Chesapeake, VA: Could not recall.

Ford Motor Company, Norfolk, VA: Could not recall.

General Electric Company, Richmond, VA: Could not recall.

General Foam Plastics Corp., Norfolk, VA: Could not recall.

General Motors Corporation: Could not recall.

Gwaltney Company, Portsmouth, VA: Could not recall.

Newport News Shipbuilding and Dry Dock Co., Newport News, VA: Could not recall.
Norfolk Shipbuilding and Dry Dock, Co., Norfolk, VA: Could not recall.
Overhead Door Company, Virginia Beach, VA: See comments above.
Phillip Morris, Inc., Richmond, VA: See comments above.
Plasser America, Chesapeake, VA: Could not recall.
Potomac Electric Power Co., Washington, D.C.: See comments above.
Power Mechanical, Inc., Hampton, VA: Could not recall.
Southeastern Public Service authority, Chesapeake, VA: See comments above.
Sumitomo Machinery Corp., Chesapeake, VA: Could not recall.
U. S. Navy, Norfolk, VA: See comments above.
AMF Bowling, Richmond, VA: Could not recall.
Alcatel-Lucent, Murry Hill, NJ: Could not recall.
Brenco, Petersburg, VA: Could not recall.
Carolina Steel Corporation, Greensboro, NC: Could not recall.
Chesapeake, Corporation, Richmond, VA: Could not recall.
Dean Foods, Dallas Texas: Could not recall.
E.I. DuPont de Nemours and Company, Wilmington, DE: See comments above.
Federal-Mogul Corporation, Southfield, MI: Could not recall.
GATX Corporation, Chicago, IL: See comments above.
The Hon Company, Muscatines, IA: Could not recall.
IGM USA Inc., Charlotte, NC: Could not recall.
Kraft Foods, Northfield, IL: Could not recall.
Norfolk Southern Corporation, Norfolk, VA: Could not recall.
Pizzagalli Construction Company, Garner, NC: Could not recall.
Schlumberger Industries, Houston, TX: Could not recall.
Seaboard Marine, Miami, FL: Could not recall.
Stanley Hardware, New Britain, CT: Could not recall.
Super Radiator Coils, Richmond, VA: Could not recall.
Waste Management (Chambers Waste Systems of Virginia): Could not recall.
Windor Supply & Mfg., Inc., Tulsa, OK: Could not recall.

The WITNESS stated that many of the companies mentioned above could have been customers of PIM. The WITNESS indicated that he could not recall any specifics at the present time.

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____
(Date)

Signed _____
(Name)

5/15/84
Dun

RENTED FROM
GAV (NAVY)

CONCRETE
BLOCK

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BILLY

Placed for GAV

Pt 6

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Jermain
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2/2/54

Elm

WORKSPACE - 1000'S WITH 1000'S IN

Pt 6

RAY GOTTLEB
12/10/88

Interviewer's Comments and Suggested Follow-up Interviews

Interviewer Comments: The WITNESS (b) (6)

(b) (6)

I have attached the sketch drawn by the WITNESS as part of this summary.

The WITNESS stated that he would sign a copy of this interview summary.

When asked if he wanted his name kept confidential (b) (6) the WITNESS stated that he does not care.

Suggested follow-up Interviews:

(b) (6)

- Christine Perry

PFE ORIGINAL

LAW OFFICES
CRENSHAW, WARE & MARTIN, P.L.C.
1200 BANK OF AMERICA CENTER
ONE COMMERCIAL PLACE
NORFOLK, VIRGINIA 23510

TELEPHONE (757) 623-3000
FACSIMILE (757) 623-5735

JAMES L. CHAPMAN, IV
EMAIL: jchapman@cwm-law
Also licensed in North Caro

January 14, 2010

VIA FEDERAL EXPRESS

Joan Martin Banks
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Response by Norfolk and Portsmouth Belt Line Railroad Company
Peck Iron and Metal Site 104(e) Request for Information
Portsmouth, Virginia

Dear Ms. Banks:

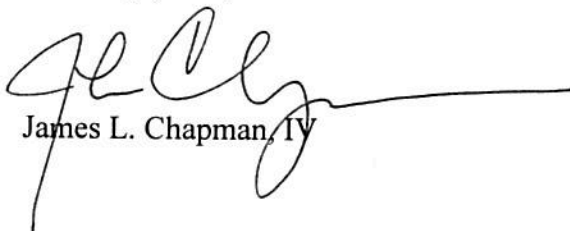
Enclosed is the response of the Norfolk and Portsmouth Belt Line Railroad Company (the "Belt Line") to the EPA's Request for Information for the Peck Iron and Metal Site in Portsmouth, Virginia (the "Site") issued October 27, 2009 (the "Request"). An extension of time to respond to the Request was granted until January 15, 2010.

The Site is defined in the Request as the Peck Iron and Metal Site located at 3850 Elm Avenue in Portsmouth, Virginia. These responses pertain to the time period of 1945 through 1997 as instructed in the Request.

The Belt Line has made reasonable inquiry and conducted a diligent search of currently available records. The responses provided to the Request are not intended and should not be construed as an admission of liability by the Belt Line for the release or threatened release of hazardous substances at the Site, or for any removal or response costs or damages attributable to hazardous substances at the Site.

In the event additional information is discovered, the Belt Line will supplement its responses accordingly. If you have any questions or comments regarding the responses, please contact me at your convenience.

Sincerely yours,



James L. Chapman, IV

JLC/dsg
Enclosure
cc: Amy Taipalus McClure



MEMORANDUM

DATE: January 14, 2010
TO: Joan Martin Banks, U.S. Environmental Protection Agency, Region III
FROM: Norfolk and Portsmouth Belt Line Railroad Company
RE: Response to EPA's October 27, 2009 Request for Information for the Peck Iron and Metal Site

RESPONSES TO NUMBERED QUESTIONS IN INFORMATION REQUEST

1. List all shipments of scrap materials, including scrap metal, which you have sent to the Site. Include the date for each transaction, the type and quantity of scrap metal sent, the amount paid or collected in connection with each transaction, the method of payment, and identity of the person making or receiving payment.

RESPONSE TO QUESTION 1:

The Belt Line objects to Question 1 on grounds that the term "scrap materials" is not defined. Subject to and without waiving said objection, the Belt Line responds to Question 1 as follows:

The Belt Line is and was a common carrier by rail and, as such, delivered shipments as a transporter of cargo by rail to the Site during the specified time period. The Belt Line has no documents pertaining to such shipments or any knowledge of the nature of the cargo delivered by rail. All such deliveries to the Site would have been at the direction of the shipper, not the Belt Line, and performed pursuant to applicable tariff(s).

In addition to deliveries to the Site as a common carrier, the Belt Line has identified shipments of specific items it sold or traded to Peck Iron and Metal ("Peck") which are described in Exhibit A attached hereto.

2. For each shipment of scrap metal identified in response to Question 1 above, identify:

- a. the source of the scrap metal;
- b. the prior use of the scrap material;
- c. whether the scrap material was a collection of homogenous materials;
- d. whether the scrap material was tested for any hazardous substances prior to shipment to Peck Iron and Metal Co.

RESPONSE TO QUESTION 2:

The Belt Line hereby incorporates its objection to Question 1 in its response to Question 2. The Belt Line further objects to Question 2 to the extent it implies that the Belt Line had any duty to test materials for hazardous substances. Subject to and without waiving said objections, the Belt Line responds to Question 2 as follows:

See Exhibit A attached hereto for information in response to Question 2(a), (b) and (c). The Belt Line is not aware whether any items shipped to Peck were tested for hazardous substances.

3. At the time of the transaction(s) involving scrap materials listed in your response to Question 1, what was the intended disposition of the scrap materials at the Site?

RESPONSE TO QUESTION 3:

The Belt Line objects to Question 3 on grounds that the term "scrap materials" is not defined. Subject to and without waiving said objections, the Belt Line responds to Question 3 as follows:

The Belt Line has no knowledge of the intended disposition of any of items and materials sent to the Site, but assumes that the items identified in Exhibit A would be resold or recycled.

4. Did a market exist for the scrap metal listed in your response to Question 1, above? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., ISRI, Department of Defense, or wherever you would find the grade published).

RESPONSE TO QUESTION 4:

The Belt Line assumes that there was a market for the scrap metal identified in Exhibit A in light of the fact that the Belt Line received consideration for such scrap metal.

5. What commercial specification grade did the scrap metal listed in your response to Question 1 meet? Identify/list the commercial specification grades that each scrap metal identified in 1 met.

RESPONSE TO QUESTION 5:

The grade of metal of the items identified in Exhibit A is unknown to the Belt Line.

6. After sale, transfer, delivery, or disposal, what portion of the scrap metal listed in your response to Question 1 was to be made available for use as a feedstock for the manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.

RESPONSE TO QUESTION 6:

The Belt Line has no knowledge as to what portion of the metal identified in Exhibit A

was to be made available for use as a feedstock for the manufacturing of new saleable products, but assumes that the items would be resold or recycled.

7. Could the scrap metal listed in your response to Question 1 have been used as a replacement or substitute for a virgin raw material? If so, provide details.

RESPONSE TO QUESTION 7:

The Belt Line does not know if the metal in the items identified in Exhibit A could have been used as a replacement or substitute for a virgin raw material.

8. Could any products to be made from the scrap metal listed in your response to Question 1 have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.

RESPONSE TO QUESTION 8:

See response to Question 7.

9. Did you process any of the scrap materials sent to Peck Iron and Metal Co. prior to transport and delivery to the Site? If yes, describe the process used and the purpose for subjecting the scrap material to the process.

RESPONSE TO QUESTION 9:

The Belt Line objects to Question 9 on grounds that the terms "scrap materials" and "process" are not defined. Subject to and without waiving said objections, the Belt Line responds to Question 9 as follows:

The Belt Line has documents indicating that the following items listed in Exhibit A were dismantled before being sent to the Site:

Cinder Car # 3
Caboose # 308
Iron Storage Rack
Fairfield Direct Locomotive Coaling Station
Old Engine House/Machine Shop
Single End Punch Machine No. P-22 (without motor)
Caboose # 404

Except for the foregoing, the Belt Line does not have any information regarding whether any materials sent to Peck were "processed" prior to transport and delivery.

10. Was the transaction between you and Peck Iron and Metal Co.: 1) an

outright sale; 2) the subject of a written or verbal "tolling" agreement between the companies; or 3) the "banking" of the transacted material in a metal account at your request for return or other disposition at a later date.

RESPONSE TO QUESTION 10:

The Belt Line objects to Question 10 on grounds that the terms "tolling agreement" and "banking" are not defined. Subject to and without waiving said objection, the Belt Line responds to Question 10 as follows:

The items identified in Exhibit A that were sent to the Site by the Belt Line on or about September 5, 1973 (Scrap Wheels), October 10, 1973 (Scrap Wheels), January 11, 1974 (Box Car), and March 19, 1974 (Scrap Wheels) were traded to Peck in exchange for five (5) tank cars. All other transactions identified in Exhibit A were outright sales.

11. Did you have a basis for believing that the scrap materials listed in your response to Question 1 would be recycled? If not, what was the basis? Provide supporting documentation.

RESPONSE TO QUESTION 11:

The Belt Line objects to Question 11 on grounds that the term "scrap materials" is not defined. Subject to and without waiving said objection, the Belt Line responds to Question 11 as follows:

In light of the fact that the Belt Line received consideration for the items identified in Exhibit A, the Belt Line assumes that the items had value and so would be resold or recycled.

12. Describe all efforts (i.e., site visits) taken by you to determine what would be done with the scrap materials identified in your response to Question 1 that may have been sold, transferred, or delivered to Peck Iron and Metal Co. at the Site.

RESPONSE TO QUESTION 12:

The Belt Line objects to Question 12 on grounds that the term "scrap materials" is not defined. The Belt Line further objects to the extent Question 12 implies that the Belt Line had a duty to make efforts to determine what would be done with the items identified in its response to Question 1. Subject to and without waiving said objections, the Belt Line responds to Question 12 as follows:

The Belt Line does not have any information regarding what would be done with the items identified in Exhibit A.

13. What steps (e.g. internal procedures, Federal, state, and local compliance

inquiries) were taken by you to ensure that Peck Iron and Metal Co., the recipient of the scrap materials listed in your response to Question 1, was in compliance with applicable Federal environmental regulations or standards, and any amendments, with respect to the scrap materials it received from you?

RESPONSE TO QUESTION 13:

The Belt Line objects to Question 13 on grounds that the terms “scrap materials” and “applicable Federal environmental regulations or standards, and any amendments” are not defined. The Belt Line further objects to the extent Question 13 implies that the Belt Line had a duty to take steps to ensure that Peck was in compliance with undefined Federal environmental regulations or standards, and any amendments. Subject to and without waiving said objections, the Belt Line responds to Question 13 as follows:

The Belt Line had no reason to believe that Peck was not in compliance with applicable Federal environmental regulations or standards, and any amendments, with respect to the items identified in Exhibit A.

14. Did you have any basis for believing that the Peck Iron and Metal Co. facility at the Site was in compliance with substantive provisions of any Federal, state, or local environmental laws or regulations, or compliance order or decree applicable to the handling, processing, reclaiming, storage, or other management activities associated with the scrap materials listed in your response to Question 1? If so, identify that basis and provide supporting documentation.

RESPONSE TO QUESTION 14:

The Belt Line objects to Question 14 on grounds that the terms “scrap materials” and “applicable Federal, state or local environmental laws or regulations, or compliance order or decree” are not defined. The Belt Line further objects to the extent Question 14 implies that the Belt Line had a duty to take steps to ensure that Peck was in compliance with undefined Federal, state or local environmental laws or regulations, or compliance order or decree. Subject to and without waiving said objection, the Belt Line responds to Question 14 as follows:

The Belt Line had no basis for believing that the Peck Iron and Metal Co. facility at the Site was not in compliance with substantive provisions of any such Federal, state, or local environmental laws or regulations, or compliance order or decree pertaining to the items identified in Exhibit A.

15. Describe the efforts you undertook with respect to the management and handling of the scrap materials listed in your response to Question 1, including the extent to which they complied with customary industry practices current at the time of the transaction designed to minimize contamination of the scrap materials by hazardous substances.

RESPONSE TO QUESTION 15.

The Belt Line objects to Question 15 on grounds that the terms “scrap materials” and “customary industry practices” are not defined. Subject to and without waiving said objection, the Belt Line responds to Question 15 as follows:

With respect to the items identified in Exhibit A, until they were determined to no longer have utility to the Belt Line, they had been used to run the railroad. From the time that the items were taken out of service until they were delivered to the Site, they would have remained in possession of the Belt Line. The Belt Line is not advised how such possession would present a risk of contamination by hazardous substances or if there was any customary industry practice at that time regarding minimization of such risk.

16. Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the scrap materials listed in your response to Question 1.

RESPONSE TO QUESTION 16

The Belt Line objects to Question 16 on grounds that “applicable Federal environmental regulations or standards” is not defined. Subject to and without waiving said objection, the Belt Line responds as follows:

The Belt Line is not advised of any Federal environmental regulations or standards regarding the subject activities pertaining to the items identified in Exhibit A or what information would show compliance with such.

17. Identify the person(s) answering these questions and request for copies of documents on behalf of your company.

RESPONSE TO QUESTION 17

The Belt Line objects to EPA communicating directly with its current employees. Should EPA have interest in further inquiring of current employees, please direct such inquiry to the Belt Line’s counsel, Crenshaw, Ware & Martin, P.L.C. Subject to and without waiving said objection, the Belt Line responds to Question 17 as follows:

Donna A. Coleman, Vice President
Norfolk and Portsmouth Belt Line Railroad Company
1050 Virginia Avenue
Portsmouth, Virginia 23704

18. For each Request, identify all persons consulted in the preparation of the answer.

RESPONSE TO QUESTION 18

The Belt Line objects to EPA communicating directly with its current employees. Should EPA have interest in further inquiring of current employees, please direct such inquiry to the Belt Line's counsel, Crenshaw, Ware & Martin, P.L.C. Subject to and without waiving said objection, the Belt Line responds to Question 18 as follows:

David Stinson, President
Norfolk and Portsmouth Belt Line Railroad Company
1050 Virginia Avenue
Portsmouth, Virginia 23704

Diane Nelson, Treasurer
Norfolk and Portsmouth Belt Line Railroad Company
1050 Virginia Avenue
Portsmouth, Virginia 23704

Gary Baker, Clerk
Norfolk and Portsmouth Belt Line Railroad Company
1050 Virginia Avenue
Portsmouth, Virginia 23704

James L. Chapman, IV, Esquire
Crenshaw, Ware & Martin, P.L.C.
1200 Bank of America Center
Norfolk, Virginia 23510

Amy Taipalus McClure, Esquire
Crenshaw, Ware & Martin, P.L.C.
1200 Bank of America Center
Norfolk, Virginia 23510

19. For each Request, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the Request and provide true and accurate copies of all such documents.

RESPONSE TO QUESTION 19

In preparation of these responses, the Belt Line consulted, examined or referred to

correspondence, agreements and other documents relating to transactions between the Belt Line and Peck. True and accurate copies of all such documents are attached hereto numbered 001-412.

20. Describe in detail any agreement/contract your company has had with Peck Iron and Metal Company. In addition, identify any other company operating at the Site and describe in detail any arrangements you have had with each such company, if any, including the time period of your involvement with such company.

RESPONSE TO QUESTION 20

The Belt Line entered into agreements with Peck from time to time for the sale of scrap.

The Belt Line entered into a side track agreement dated May 1, 1946 with Julius S. Pecker [sic], trading as Peck Iron & Metal Company, whereby the Belt Line agreed to operate a side track constructed upon a parcel of land owned by Julius S. Pecker [sic]. The Belt Line subsequently entered into an undated agreement with Julius S. Pecker [sic], trading as Peck Iron & Metal Company, whereby Peck Iron & Metal Company, Inc. was mutually agreed to be considered as a successor to Julius S. Pecker [sic] with regard to said sidetrack agreement.

The Belt Line entered into a private grade crossing agreement with Peck Iron and Metal Company, Inc. and C-E Morgan Building Products, Inc. ("Morgan"), dated June 30, 1976 whereby the Belt line granted to Peck and Morgan the right and license to use the Scott Center Road crossing in the City of Portsmouth.

The Belt Line entered into a utility crossing agreement dated September 9, 1974 with Peck Iron and Metal Company, Inc. whereby the Belt Line granted to Peck a revocable and terminable license to locate, construct, lay and maintain a 10" cast iron water line under the right of way and track of the Belt Line.

The Belt Line is not aware of any other company that operated at the Site during the specified time period.

21. Provide all business records pertaining to your company and Peck Iron and Metal Company, or any other company operating at the Site, including:

- a. Copies of correspondence to and from these companies, including letters and memoranda (both internal and external);
- b. Copies of invoices, manifests, bills-of-lading, purchase orders, tickets, and any other documents pertaining to shipping, receiving, and transporting scrap materials; and;
- c. Copies of all business records pertaining to sale, transfer, delivery, or disposal, of any hazardous substances, scrap materials, and/or recycled materials to the Site.

- d. If you are unable to provide any or all of these documents, explain why, and what you did to find them.**

RESPONSE TO QUESTION 21

- a. Copies of existing correspondence to or from Peck are attached hereto numbered 001-064.
- b. The Belt Line objects to Question 21(b) on grounds that the term “scrap materials” is not defined. The Belt Line further objects on grounds that although the Belt Line may have transported materials for others to the Site, such carriage, if any, was as a common carrier providing rail transportation services for third parties pursuant to applicable tariff(s). Without waiver of its objection, copies of existing documents partly responsive to this request are attached hereto numbered 082-412.
- c. The Belt Line objects to Question 21(c) on grounds that the terms “scrap materials” and “recycled materials” are not defined. Subject to and without waiving said objection, copies of existing documents responsive to this Question are attached hereto numbered 001-412
- d. Shipping documents pertaining to deliveries for third parties as requested in subparagraph b are only retained for a period of four years after the delivery.

22. If you have reason to believe that someone could provide a more detailed or complete response to any of these questions or requests for copies of documents, or if you have reason to believe that there could be someone who may be able to provide additional documents that would be responsive to these questions and request for copies of documents, identify such person(s), identify the additional documents that they may have, and describe any information related to these questions that they may have.

RESPONSE TO QUESTION 22

None at this time other than former employees or agents of Peck.

23. Provide details, including dates and materials involved, of all on-site spills or releases of hazardous materials of which you have knowledge and that occurred during the processing of scrap materials containing hazardous substances at the Site.

RESPONSE TO QUESTION 23

The Belt Line objects to Question 23 on grounds that the term “scrap materials” is not

defined. The Belt Line has no knowledge of any on-site spills or releases of hazardous materials at the Site.

24. To the extent not identified in Question 1, identify all transactions or agreements for disposal in which your company gave, sold, or transferred any material or item, scrap materials, waste materials, pollutant, or contaminant, including copper-bearing material and ash, to the Site. In addition:

- a. State the dates on which each such person may have given, sold, transferred, or delivered such material.
- b. Describe the materials or items that may have been given, sold, transferred, or delivered, including the type of material, chemical content, physical state, quantity by volume and weight, and other characteristics.
- c. Describe the nature, including the chemical content, characteristics, physical state (e.g., solid liquid) and quantity (volume and weight) of all hazardous substances involved in each such arrangement.
- d. State whether any of the hazardous substances identified in subpart c. above exhibit any of the characteristics of a hazardous waste identified in 40 C.F.R. Section 261, Subpart C.

RESPONSE TO QUESTION 24

The Belt Line objects to Question 24 on grounds that the terms "scrap materials," and "waste materials" are not defined. Subject to and without waiving said objection, the Belt Line responds to Question 24 as follows:

See transactions and agreements described in response to Question 1 in Exhibit A.

25. What other materials, if any, did you send to the Site (items/materials not covered in Question 25 above)?

- a. Describe the purpose of each sale, transfer, or delivery of materials to the Site.

RESPONSE TO QUESTION 25

See items described in response to Question 1 in Exhibit A.

26. Describe what was done to materials indicated in your response to Questions 24 and 25 above once they were brought to the Site including any further processing of the materials.

RESPONSE TO QUESTION 26

The Belt Line has no knowledge of what was done to the items identified in Exhibit A once they were brought to the Site but assumes the items were resold or recycled in some capacity.

27. Identify the person(s) who sold, transferred, delivered, and selected the Site as the location at which scrap materials from your company were to be disposed or treated.

a. Identify all documents mentioning these arrangements for disposal.

b. Describe all efforts (i.e., site visits) taken by the person(s) identified in your response to determine what would be done with the materials that may have been sold, transferred, or delivered after such materials had been sold, transferred, or delivered to the Site.

RESPONSE TO QUESTION 27

The Belt Line objects to Question 27 on grounds that the term "scrap materials" is not defined. The Belt Line further objects on grounds insofar as Question 27 implies that the Belt Line had a duty to determine what would be done with the materials after they were delivered to the Site. The Belt Line further objects on grounds that this Question does not make grammatical sense. Subject to and without waiving said objections, the Belt Line responds to Question 27 as follows:

Although the Belt Line may have transported materials for others to the Site, the shipper, not the Belt Line, selected the destination for such common carrier rail shipments.

The Belt Line sold, transferred and/or delivered items owned by the Belt Line to the Site from time to time between 1948 and 1974 as shown in Exhibit A. Agents of Peck would have selected the Site as the location to which Belt Line scrap would be sent.

a. See documents mentioning arrangements for the transfer of the items identified in Exhibit A to the Site attached hereto.

b. The Belt Line has no records indicating what may have been done to determine what Peck did with the items sold, transferred, or delivered to the Site after such materials had been sold, transferred or delivered to the Site.

28. For each sale, transfer, or delivery of materials to the Site, had any hazardous substances been added to the materials described in your response to Questions 24 and 25 above? If so, identify the hazardous substance added to the person responsible for adding such hazardous substance.

a. Why were these hazardous substances added to the materials?

b. Describe the source of or the process that the materials described in your response to Questions 25 and 25 above.

RESPONSE TO QUESTION 28

Not applicable. See also response to Question 15.

29. Identify all individuals who currently have, or who previously had, responsibility for your environmental matters (e.g., responsibility for the disposal, treatment, storage, recycling, or sale of your company's wastes, scrap materials and/or recyclable materials). Hereafter, these individuals are referred to as environmental caretakers. For each environmental caretaker, indicate the dates of the individual's employment or contractual obligation (i.e., the dates indicating the length of the individual's tenure[s]), the nature of the individual's duties and responsibilities, and a description for the type of environmental information that the individual would know.

RESPONSE TO QUESTION 29

The Belt Line objects to EPA communicating directly with its former managing employees. Should EPA have interest in further inquiring of former managing employees, please direct such inquiry to the Belt Line's counsel, Crenshaw, Ware & Martin, P.L.C. Subject to and without waiving said objection, the Belt Line responds to Question 29 as follows:

The President of the Belt Line would have had responsibility for environmental matters. The following individuals held the position of President during the requested time period:

Dennis A. Walker 1989 – 1997 (retired)

Lewis W. Fisher
1987 – 1989 (retired)

Herbert S. Morrison 1966 – 1987 (deceased)

Percy C. Wingo 1958 – 1966 (deceased)

Harry L. White, Jr. 1946 – 1957 (deceased)

Morris S. Hawkins 1945 – 1946 (deceased)

	Type	Quantity	Amount Paid	Source	Prior Use	Materials
2/6/1948	Steam Locomotive # 38 Class S-5, Type 0-6-0 Serial No. 45539	191,160 lbs	\$2,025.14	Secondhand, Built by Baldwin Locomotive Works	Steam Locomotive	Steel
2/16/1948	Locomotive # 10 Class S-3, Type 0-6-0	147,280 lbs	\$1,549.13	Built by Baldwin Locomotive Works	Locomotive	Steel
2/26/1948	Locomotive # 43 Class C-2A, Type 2-8-0, Built 1905	241,620 lbs	\$2,572.55	Built by Baldwin Locomotive Works	Locomotive	Steel
5/19/1948	Locomotive # 25 Class C-2, Type 4-8-0, Built 1907	231,000 lbs	\$2,480.16	Built by American Locomotive Works	Locomotive	Steel
2/15/1949	Locomotive # 31 Class S-5, Type 0-6-0	161,080 lbs	\$1,452.48	Unknown	Locomotive	Steel
10/28/1949	Locomotive # 42 ¹ Class C-2A, Type 2-8-0	109.107 tons	\$1,091.07	Purchased from Pennsylvania Railroad Company	Steam Locomotive	Steel
Jan. or Feb. 1950	Cinder Car # 3 ¹ (formerly ACL 60995)	9,590 lbs	\$62.34	Unknown	Cinder Car	Wood and steel
12/1/1951	Caboose # 308 ¹ (formerly #321), Built 1928	40,000 lbs	\$92.15	W.A. Zelnicker, St. Louis, MO	Caboose	Wood and steel
2/28/1955	Cinder Car #11 (formerly N&W 74016)	41,520 lbs	\$481.96	Purchased from Norfolk & Western Rwy. Co.	Cinder Car	Wood and steel
3/21/1956	Steam Locomotive # 37 ² Class S-5, Type 0-6-0	See footnote 2.	\$3,240.93	Purchased secondhand from Pennsylvania Railroad Company	Steam Locomotive	Steel
3/21/1956	Steam Locomotive # 57 ² Class S-6	See footnote 2.	\$3,375.70	Purchased from U.S. Dept. of Commerce, Maritime Administration. Built by Lima Locomotive Works	Steam Locomotive	Steel
3/21/1956	Steam Locomotive # 61 ² Class S-6A, Type 0-6-0	See footnote 2.	\$3,372.06	Purchased from Railway Accessories Co. Built by American Locomotive Company.	Steam Locomotive	Steel
3/21/1956	Steam Locomotive # 63 ² Class S-6A, Type 0-6-0, Serial No. 70398	See footnote 2.	\$3,437.92	Purchased from Railway Accessories Co. Built by American Locomotive Company.	Steam Locomotive	Steel

Norfolk and Portsmouth Belt Line Railroad Company

EXHIBIT A to January 14, 2010 Response to Information Request regarding Peck Iron and Metal Site, Portsmouth, Virginia

3/21/1956	Steam Locomotive # 80 ² Class S-8, Type 0-6-0, Serial No. 60348	See footnote 2.	\$4,452.67	Purchased from Seaboard Air Line RR Co. Built by Baldwin Locomotive Works.	Steam Locomotive	Steel
Aug '56	Cinder Car # 1 ¹ (formerly SSW 38033 - Box Car)	15.32 tons	\$758.34	Converted from box car	Box Car, then Cinder Car	Wood and steel
4/20/1957	Steam Locomotive Boiler & Fittings ¹ (Scrap Steel)	20.0625 tons (steel)	\$702.19	Unknown	Central heating plant for Port Norfolk Shops.	See Roadway Completion Report pp. 227-
4/23/1957	Iron Storage Rack ¹	3.933 tons	\$157.32	Unknown	Storing large quantities of iron & steel.	241 Iron
4/30/1957	Work Coal Car ¹ (formerly Locomotive #3)	Unknown	\$596.75	Converted from tender of Locomotive # 3	Supply coal to central heating plant at Port Norfolk Shops.	See Roadway Completion Report pp. 262-
May '57	Fairfield Direct Locomotive Coaling Station ¹	7.69 tons	Unknown	Unknown	Coaling facility	270 Steel
Mar or Jul '61	Cinder Car # 4 ¹	36,460 lbs	\$488.31	Converted from box car	Cinder Car	Wood and steel
4/27/1961	Caboose # 315 ¹	27,900 lbs	\$373.65	Purchased from Norfolk & Western Rwy. Co.	Caboose	Wood and steel
1963 or 1964	Old Engine House and Machine Shop ¹ Roof and walls of 3 units. (metal material only)	16.305 tons	\$326.10	Constructed by Greaham Metal Buildings, Co.	Engine house and machine shop.	See Roadway Completion Report pp. 308-
Dec '65	Long & Alstater Single end punch ¹ Machine No. P-22	See footnote 3.	\$250 (together with Machine No. P-40)	Machine Tools Sales Co.	Punch	319 Unknown
Dec '65	Electric Hoist ¹ Machine No. P-40	See footnote 3.	\$250 (together with Machine No. P-22)	Purchased from Industrial Machinery & Equipment Co.	Hoist	Unknown
3/22/1968	Caboose # 400 steel underframe (formerly DL&W 737)	Unknown	\$235.00	Purchased from Georgia Car & Locomotive Co.	Caboose	Wood and steel
3/22/1968	Caboose #401 steel underframe (formerly DL&W 743)	Unknown	\$235.00	Purchased from Georgia Car & Locomotive Co.	Caboose	Wood and steel

[illegible]